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Via ECF

September 15, 2022

The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Brennan Center for Justice at New York University School of Law v. United States Department of State*, 17 Civ. 7520 (PGG)

Dear Judge Gardephe:

I am lead counsel for Plaintiff Brennan Center for Justice at New York University School of Law (“Brennan Center”) in the above-captioned Freedom of Information Act litigation.

On September 13, the Court reset the conference in this case from September 16 to September 20. Due to a conflicting professional obligation, explained in further detail below, I respectfully request that the conference be rescheduled for one of the following dates: Friday, September 23, Wednesday, September 28, or Thursday, September 29. I have spoken with counsel for the defendant, AUSA Christopher Connolly, and he consents to the continuance and is available on the suggested dates. In the alternative, if the Court is willing to conduct the conference by teleconference or a video conference, I could appear at the time currently scheduled on September 20 (or any other time on the 20th before 3 pm), or on the following additional dates on which both Mr. Connolly and I are available: all the above-listed dates; Wednesday, September 21; before noon on Thursday, September 22; after 3 pm on Monday, September 26; or before 3 pm on Tuesday, September 27.

The conflict arises from my representation of a lawyer who is charged by District of Columbia Disciplinary Counsel with violations of D.C. Rules of Professional Conduct. The matter is now before the D. C. Board on Professional Responsibility, which several months ago scheduled oral argument for September 22. I believe that my preparation for the argument, which will require most of my attention in the days immediately preceding September 22, would be substantially impaired by devoting the time required to make a trip to New York for a conference on the 20th. I hope that the several alternatives that Mr. Connolly and I have offered will make it possible to reschedule the conference.

Thank you for your consideration of this matter.

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Sincerely,

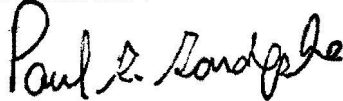
/s/ Mark H. Lynch
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cc: Counsel of Record (by ECF)

Memo Endorsed: The conference currently scheduled for September 20, 2022 will instead take place on **September 21, 2022 at 2:30 p.m.** by telephone. The parties are directed to dial 888-363-4749 to participate, and to enter the access code 6212642. The press and public may obtain access to the telephone conference by dialing the same number and using the same access code. The Court is holding multiple telephone conferences on this date. The parties should call in at the scheduled time and wait on the line for their case to be called. At that time, the Court will un-mute the parties' lines. One day before the conference, the parties must email Michael_Ruocco@nysd.uscourts.gov and GardepheNYSDCchambers@nysd.uscourts.gov with the phone numbers that the parties will be using to dial into the conference so that the Court knows which numbers to un-mute. The email should include the case name and case number in the subject line.

Dated: September 19, 2022

SO ORDERED.



Paul G. Gardephe
United States District Judge